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Chapter 7 Trustee*

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

In re:

ROBERT G. SCHROEDER, et al.,  
  
Debtors.

Chapter 7

Lead Case No. 13-16624 (NLW)  
(Substantively Consolidated)

Honorable Novalyn L. Winfield

**APPLICATION IN SUPPORT OF ENTRY OF CONSENT ORDER EXTENDING  
TIME FOR THE CHAPTER 7 TRUSTEE TO FILE A COMPLAINT OBJECTING  
TO DISCHARGE UNDER 11 U.S.C. § 727 UNTIL DECEMBER 31, 2014**

TO: HONORABLE NOVALYN L. WINFIELD  
UNITED STATES BANKRUPTCY JUDGE

Donald V. Biase, Chapter 7 Trustee (the “Trustee”) for the above-captioned Debtors, by and through his undersigned counsel, seeks the entry of a consent order extending the time for the Trustee to object to discharge pursuant to 11 U.S.C. § 727, and represents as follows:

1. On March 28, 2013, an Involuntary Petition for Relief under Chapter 7 of the Bankruptcy Code was filed against Robert G. Schroeder (“Schroeder”). On April 23, 2013, the Court entered the Order for Relief.
2. On April 30, 2013, Mr. Donald V. Biase was appointed as Chapter 7 Trustee for Schroeder’s case.
3. On September 26, 2013, the Trustee conducted Schroeder’s meeting of creditors.

4. Based upon the Trustee's review of the information that he has received to date, there appear to be a number of issues which require further investigation by the Trustee.

5. The Trustee and Schroeder have consented to extension of the period of time within which the Trustee may file an objection to Schroeder's discharge pursuant to 11 U.S.C. § 727.

6. On August 26, 2013, the Court extended the time period for the Trustee to object to discharge under 11 U.S.C. § 727 until October 30, 2013.

7. On October 31, 2013, the Court further extended the time period for the Trustee to object to discharge under 11 U.S.C. § 727 until January 31, 2014.

8. On January 24, 2014, the Court further extended the time period for the Trustee to object to discharge under 11 U.S.C. § 727 until April 30, 2014.

9. On April 30, 2014, the Court further extended the time period for the Trustee to object to discharge under 11 U.S.C. § 727 until September 3, 2014

**WHEREFORE**, the Trustee respectfully requests entry of the Consent Order submitted herewith extending the time period referenced above from September 3, 2014, through and including December 31, 2014.

**TRENK, DiPASQUALE,  
DELLA FERA & SODONO, P.C.**  
*Counsel to Donald V. Biase, Chapter 7 Trustee*

By: /s/ Shoshana Schiff  
SHOSHANA SCHIFF

Dated: September 2, 2014